

From: Mike Mahoney/ESC/R3/USEPA/US
Sent: 4/4/2012 10:44:06 AM
To: Cynthia Caporale/ESC/R3/USEPA/US@EPA
CC: Ed Messer/ESC/R3/USEPA/US@EPA; Fred Foreman/ESC/R3/USEPA/US@EPA; Robin Costas/ESC/R3/USEPA/US@EPA
Subject: Re: Fw: EXTERNAL: Re: Verification/Completeness Check for Dimock (R3 WO 1202005 PART 3 Posted Mar 20)

I would recommend dropping the "D" qualifier and just note in the narrative: "A %RSD exceeding the acceptance window - at and below the reporting level - is not a relevant indicator of the system out of control- no action was taken by the reviewer for the associated samples."

Upping the RL is, to me, an acceptable compromise at this level.

Michael Mahoney
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Quando Omni Flunkus Moritati

From: Cynthia Caporale/ESC/R3/USEPA/US
To: Ed Messer/ESC/R3/USEPA/US@EPA
Cc: Fred Foreman/ESC/R3/USEPA/US@EPA, Mike Mahoney/ESC/R3/USEPA/US@EPA, Robin Costas/ESC/R3/USEPA/US@EPA
Date: 04/03/2012 04:41 PM
Subject: Fw: EXTERNAL: Re: Verification/Completeness Check for Dimock (R3 WO 1202005 PART 3 Posted Mar 20)

Here's SERAS' response. Our practice is not to elevate the QLs but that is what is being done for this project. Other than that statement is the rest ok?

Cynthia Caporale, Chief
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Fort Meade, MD
(410) 305-2732
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----- Forwarded by Cynthia Caporale/ESC/R3/USEPA/US on 04/03/2012 04:41 PM -----

From: [Ex. 4 - CBI]@lmco.com>
To: Cynthia Caporale/ESC/R3/USEPA/US@EPA
Cc: [Ex. 4 - CBI]@lmco.com>, Gary Newhart/CI/USEPA/US@EPA, John Gilbert/CI/USEPA/US@EPA, Kelley Chase/R3/USEPA/US@EPA, [Ex. 4 - CBI]@lmco.com>, Robin Costas/ESC/R3/USEPA/US@EPA, Ed Messer/ESC/R3/USEPA/US@EPA, Fred Foreman/ESC/R3/USEPA/US@EPA, Stevie Wilding/ESC/R3/USEPA/US, [Ex. 4 - CBI]@lmco.com>
Date: 04/03/2012 04:38 PM
Subject: RE: EXTERNAL: Re: Verification/Completeness Check for Dimock (R3 WO 1202005 PART 3 Posted Mar 20)

Cindy,

If that is the practice used by R3 to validate data, I will direct the SERAS staff on-site to elevate the RL to the level found in the field blank. Since R3 practice is to elevate all samples in the batch to the highest level found in the blanks, I am assuming that the RL for all samples in Batch BB21606 will be 43 mg/L based on FB16 collected on 2/13/12. Anything over that is not qualified. Please confirm.

Ex. 4 - CBI

From: Cynthia Caporale [mailto:Caporale.Cynthia@epamail.epa.gov]

Sent: Tuesday, April 03, 2012 3:15 PM

To: **Ex. 4 - CBI** A

Cc: Gary Newhart; John Gilbert; Kelley Chase; **Ex. 4 - CBI** Robin Costas; Ed Messer; Fred Foreman; Stevie Wilding

Subject: EXTERNAL: Re: Verification/Completeness Check for Dimock (R3 WO 1202005 PART 3 Posted Mar 20)

The report on the Dimock Verification/Completeness Check for file 1202005 FINAL PART 3 of 3 R33907 was reviewed and below are the responses for your consideration.

Please note that we (including QA Staff responsible for R3 Data Validation) disagree with the approach taken for Item #4. A response is provided and if further discussion is needed please let me know and we'll arrange a conference call.

File 1202003 FINAL PART 3 of 3 R33907 03 14 12 1314.pdf - The file name listed here should be 1202005 FINAL PART 3 of 3 R33907 03 20 12 1017.pdf .

1. For total nitrogen, the RPD for sample HW55 (lab ID# 1202005-10) exceeded the 20% criterion. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, a "UJ" flag needs to be entered into the result qualifier column for this sample.

Response: The RPD result was flagged with a "D" which is defined as: " Source sample result and/or duplicate sample result are below the quantitation limit and the RPD is artificially high. Precision data (RPD value) has no significance for this QC Sample." When QC results are below the reporting limit our LIMS includes the results in the QC section. Therefore, qualifying sample results is not necessary in this case (no "UJ" is needed).

2. For oil and grease analyzed under batch BB20707, the LCS, MRL check and the MS recoveries for sample HW59 (lab ID# 1202005-01) and HW03 (lab ID# 1202005-34) were all below the respective acceptance criteria. This reviewer agrees with the lab qualifier of "UJ" assigned to all the samples. Non-detect results for HW27z, HW27, FB16, HW55, HW59, HW11-P, HW11, HW53, HW53-P, FB17, HW57-P, HW58, HW57, HW03, HW03z, FB18 and HW07 should be flagged "UJ" in the result qualifier column.

Response: This comment appears to be an instruction for entering into Scribe and not a change in qualification of result. If this assumption is correct then we agree with the comment.

3. For TDS in Batch BB21606, the RPD for sample HW27 (lab ID# 1202005-08) exceeded the 20% criterion. This reviewer agrees with the "J" flag assigned by the laboratory. Since it cannot be ascertained if all the samples in the batch are sufficiently similar, a "J" flag needs to be entered into the result qualifier column for this sample.

Response: This comment appears to be an instruction for entering into Scribe and not a change in qualification of result. If this assumption is correct then we agree with the comment.

4. For TDS in Batch BB21606, the field blank (FB16) associated with sampling conducted on 2/13/12 exceeded the RL. Since there are no provisions in the National Functional Guidelines for raising the RLs based on field blank contamination, the samples associated with this field blank have been qualified "J" to err on the conservative side. A "J" qualifier should be placed in the Scribe result qualifier column for samples HW27z, HW27, HW55, HW11-P, HW11, HW53 and HW53-P.

Response: Region 3 Data Validation Procedures include criteria for qualifying samples based on field blanks. According to Region 3 procedures results that are 5x or 10x below the amount found in a field or method blank are qualified "B." Since the "B" qualifier is not being used for this project, we highly recommend the quantitation limit be raised and qualified as "U." Retaining the value and qualifying "J" is not recommended for the data use involved with the project as it tends to cause confusion as to the presence of a compound or constituent when really the value was due to blank contamination.

5. It is assumed that all required instrument QC in the method was run and was within the criteria listed in the EPA R3 SOPs since this information is not available in the laboratory report.

Response: All QC information is available in the associated case files.

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From: [Ex. 4 - CBI]@lmco.com>
To: Cynthia Caporale/ESC/R3/USEPA/US@EPA, Kelley Chase/R3/USEPA/US@EPA
Cc: [Ex. 4 - CBI]@lmco.com>, John Gilbert/CI/USEPA/US@EPA, Gary Newhart/CI/USEPA/US@EPA, [Ex. 4 - CBI]
[Ex. 4 - CBI]@lmco.com>
Date: 03/28/2012 10:53 AM
Subject: Verification/Completeness Check for Dimock (R3 WO 1202005 PART 3 Posted Mar 20)

.....is attached for your review and consideration.

From: Cynthia Caporale [mailto:Caporale.Cynthia@epamail.epa.gov]
Sent: Tuesday, March 20, 2012 5:16 PM
To: gilbert.ohn@epa.gov; Kelley Chase
Cc: [Ex. 4 - CBI]
Subject: EXTERNAL: Dimock Residential GW Site - Notification of Report Postings

This email serves as notification that files listed below have been posted to the R03FTP Site\Dimock\EPA LaboratoryAnalytical Data_Feb 2012 directory.

For all laboratory reports associated with the files listed below have been reviewed to the Step 2b as described in the Dimock EPA Data Process Matrix (2/10/12).
Case narratives included in pdf files.
No addendum narratives for these files were needed.

R3(WO 1202005 PART 3 Posted Mar 20)

1202005 FINAL PART 3 of 3 R33907 03 20 12 1017.pdf
EDD 3 of 3 1202005 FINAL 03_15_12.txt

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Fax: (410) 305-3095 [attachment "SERAS-172-DSR-032812_37.docx" deleted by Cynthia Caporale/ESC/R3/USEPA/US]